UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

ROBERT B BANNON Chapter 13

Debtor Bankruptcy No. 17-15757-ELF

OBJECTION OF CHAPTER 13 TRUSTEE
TO CONFIRMATION OF PLAN OF DEBTOR(S)

AND NOW comes, WILLIAM C. MILLER, ESQUIRE, chapter13 standing trustee, to object to confirmation of the chapter 13 plan of debtor(s), because it fails to comply with 11 U.S.C. Sections 1322 and/or 1325 of the Bankruptcy Code, and/or debtor(s) has/have failed to provide information, evidence, or corrections to the petition, schedules, statements or other documents filed by debtor(s) to enable the standing trustee to evaluate the Plan for confirmation, as follows:

The Plan violates 11 U.S.C. Section 1325(a)(4) in that the value of property to be distributed under the plan on account of each allowed unsecured claim is less than the amount that would be paid on such claim if the estate of the debtor(s) were liquidated under Chapter 7.
The claims and/or claim amounts identified in the Plan are inconsistent with one or more filed proofs of claim.
The Plan is unclear and/or incorrect as to how the secured and priority claims are to be treated and/or paid by the standing trustee.

WHEREFORE, the standing trustee requests that the Court enter an order in the form annexed hereto denying confirmation of the Plan.

Respectfully submitted,

/s/ William C. Miller
William C. Miller, Esquire
Chapter 13 Standing Trustee